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OKB

November 8, 1999

Magalie Roman-Salas
Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room TW-A325
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: BellSouth Petition for Forbearance for Nonlocal Directory
Assistance Service; CC Docket No. _____

Dear Ms. Roman-Salas:

Pursuant to discussions with Commission Staff, BellSouth submits the attached supplemental description of the network architecture for BellSouth's national directory assistance service. In particular, BellSouth clarifies and confirms that all listings offered through its NDA service will be housed in information storage facilities owned in their entirety (100%) by BellSouth.

Please associate this supplement with BellSouth's Petition for Forbearance in the record of the proceeding designated above.¹

Sincerely,



A. Kirven Gilbert III

AKG:ksb
Attachment

cc: Michelle Carey
Audrey Wright

¹ BellSouth filed its Petition on October 8, 1999. Subsequently, Bell Atlantic submitted a similar petition for which the Commission established a pleading cycle in CC Docket 97-172. BellSouth anticipates that its Petition will also be considered in that docket.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)
)
BellSouth Petition for Forbearance)
for Nonlocal Directory Assistance Service)

CC Docket No. _____

**SUPPLEMENTAL DESCRIPTION OF NETWORK
ARCHITECTURE FOR BELL SOUTH'S NDA SERVICE**

Pursuant to discussions with Commission Staff, BellSouth provides this supplemental description of the network architecture for BellSouth's national directory assistance (NDA) service.¹ In particular, BellSouth clarifies and confirms that all listings offered through NDA service, *i.e.*, both in-region listings and out-of-region listings, will be housed in information storage facilities owned in their entirety (100%) by BellSouth. The architecture and call flow for both regional and non-regional listings are described below.

As indicated in the accompanying diagram, an incoming call to BellSouth's directory assistance service is recognized as a DA call and routed within BellSouth's network to a Traffic Operator Position System ("TOPS") remote switch, the entry point to BellSouth's operator services network. At that point, the TOPS remote bridges an Automated Directory Assistance Services ("ADAS") platform onto the call. The ADAS system prompts the caller for the desired city, state, and listing and then records the caller's responses. The call is then routed over BellSouth's operator services network to an operator in one of the 43 distributed operator service centers in BellSouth's region.

¹ See, In the Matter of BellSouth Petition for Forbearance for Nonlocal Directory Assistance Service, CC Docket 97-172, BellSouth Petition for Forbearance (filed October 8, 1999) ("Petition").

The operator receiving the call listens to the recorded request from ADAS, or if incomplete or unintelligible, communicates directly with the caller to ascertain the caller's request. Upon obtaining that information, the operator launches a database query. All queries are initially launched to one of two redundant databases that contain listing information for subscribers within BellSouth's region, including listing data of subscribers of CLECs and independent companies in BellSouth's region that have provided such information to BellSouth.² Both of these regional databases are housed in information storage facilities wholly owned by BellSouth.

If the caller is requesting a local or nonlocal listing within BellSouth's region, that information is returned by the regional database that has been queried and is played for the caller by an audio response unit that is adjunct to the originating TOPS remote switch.


If the caller is requesting a number of a subscriber outside of BellSouth's region or of a subscriber of a carrier in BellSouth's region that has not provided its listing data to BellSouth, the query will be routed on to a national database that will contain such out-of-region listings. BellSouth has purchased (and owns 100%) a Nortel D1 storage facility on which a complete copy of this out-of-region database will be stored. BellSouth has contracted with its data vendor, LSSI, to populate this storage system with the database, a process which BellSouth expects to be completed in January, 2000. Listing information retrieved from this database in response to operator queries will be returned to the caller and played by the same audio response units used for in-region listings.

² As BellSouth indicated in its Petition, some CLECs and independent companies in BellSouth's region have chosen not to provide their listing information to BellSouth for use in BellSouth's DA operations because of sharing obligations that attach to such use by BellSouth. In some cases, however, BellSouth has been able to obtain listing data of such carriers in the marketplace from third parties. BellSouth Petition at n. 19.

BellSouth will provide the interLATA transmission facilities between the TOPS remotes, the TOPS hosts, the operator service centers, and the regional and national databases. In the *US West Forbearance Order*,³ the Commission found provision of non-local directory assistance service over an architecture substantially similar to this to constitute provision of an interLATA service. Because BellSouth will own in their entirety all of the information storage facilities on which the nonlocal directory assistance information will be housed, however, BellSouth's NDA service will fall squarely within the requirements of Section 271(g)(4).⁴ Thus, BellSouth's NDA service is a permitted incidental interLATA service and appropriately subject to Section 10⁵ forbearance from the requirements of Section 272.⁶ For the reasons set forth in BellSouth's Petition, such forbearance should be granted.

Respectfully submitted,

BELLSOUTH CORPORATION

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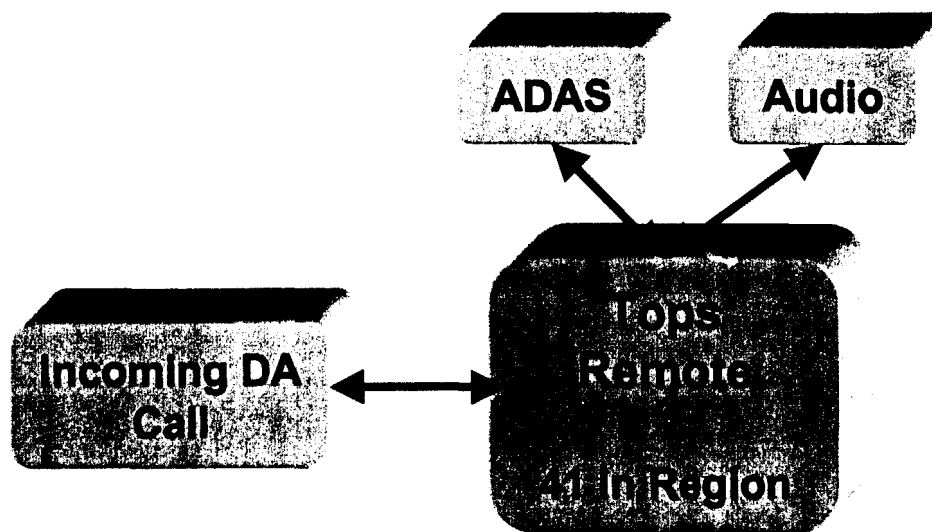
DATE: November 8, 1999

³ *Memorandum Opinion and Order*, CC Docket Nos. 97-172, 92-105, FCC 99-133 (rel. Sept. 27, 1999) ("*US West Forbearance Order*").

⁴ 47 U.S.C. § 271(g)(4).

⁵ 47 U.S.C. § 160.

⁶ 47 U.S.C. § 272.



- Customer dials 411 or call arrives from CLEC, IXC, PSP, Cellular, etc
- Call routed to Tops Remote
- ADAS prompts for city, state, and listing
- Call connected to operator
- Operator initiates search
- All queries sent to BellSouth Regional data base
- Regional info is returned from BellSouth Regional data base
- Out of region query sent on to BellSouth National data base
- National info is returned from BellSouth National data base
- Response is played to caller by audio response unit



* Nortel D1 Data Bases Owned and Operated by BellSouth